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1276 E. Evergreen Drive
Phoenixville, PA 19460
August 14, 1991

Ms. Lisa Cunningham (3HW26)
U.S. Environmental Protection Agency, Region III
841 Chestnut Street
Philadelphia, PA 19107

Dear Ms. Cunningham,

It is a great relief to the neighbor of the Valley Forge General Hospital to know that the Army Corps of Engineers (ACE) is going to continue their investigation of contamination at the site. Although I am happy to see this progress, and I see no benefit to dwell on past activities, I feel compelled to set the record straight in one area - the EPA's response to my 3/11/91 comments on the SI report (Mr. R. Harris' 5/6/91 memo to you).

Although I never received a written response from the EPA, the ACE provided me with a copy of Mr. Harris' review of my comments. After a lengthy discussion with Mr. Harris, it was clear to me that he did not fully understand why his response was inappropriate. Thus, I write this letter.

1. The EPA response to my comments is based on review of a different report, the "Final" SI report dated 4/1/91. My comments are on an earlier version of this report, also titled "Final" (February 1991).
2. The EPA response is taken out of context with respect to time. At the time of my comments, it had been made clear to the public that any future study of the site was very unlikely. EPA's response, however, was made with definite knowledge that further work is planned and funded.
3. EPA misunderstood the objectives as stated in the workplan. Although this investigation should have been and is now being considered preliminary, it was not presented as preliminary at the time of my comments. Without attending the two public meetings, EPA did not have knowledge of this public perspective created by the ACE. The objectives stated in the SI were much too broad and ambitious for the scope and true intent of this study.
4. I am concerned by the apparent lack of objectivity displayed by the EPA, the taxpayer's "watchdog". First, it would have been more appropriate for Mr. Harris to have addressed all of my comments instead of a select group of comments with which he disagreed. Secondly, since Mr. Harris' letter was a direct review of my comments, professionally, I should have received a copy from the EPA rather than from the ACE.

5. There seems to be disagreement between the EPA's and the ACE's satisfaction with the ability of one sampling round to determine risk. Although Mr. Harris appears satisfied with the determination that there is no imminent danger, the ACE states, "This number of samples per study area is usually considered insufficient and represents the largest single source of uncertainty in this assessment." (Keith B. Hoddinott, CPSS - Health Risk Evaluation Study No. 39-26-L990-91, April 1991).

In closing, I would like to say that I commented only on the aspects of the SI report in which I have expertise. I did not attempt to address the details of the risk assessment, only its basis. Furthermore, many of my comments would not have been necessary if the SI had not been presented as a complete and final investigation. Just to reiterate, I think it's important to not dwell on past activities, but rather to focus on what is most important, that future investigation and remediation, if necessary, are planned and funded.

Finally, I do appreciate the obvious time and effort that the EPA has devoted to this project, and I look forward to future EPA involvement for the remainder of the investigation of the Valley Forge General Hospital site.

Sincerely

Karen Neely
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cc. Senator E. Baker, G. Bonner, G. Earhart, I. Ewald, R. Harris,
K. Hoddinott, T. Ryan, Representative R. Schulze,
Senator A. Specter, Representative P. Vroon,